

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

STATE OF RHODE ISLAND OFFICE OF) Civil Action No. 1:24-cv-00151-LMB-LRV
THE GENERAL TREASURER, ON BEHALF)
OF THE EMPLOYEES' RETIREMENT) CLASS ACTION
SYSTEM OF THE STATE OF RHODE)
ISLAND, Individually and on Behalf of All)
Others Similarly Situated,)
)
Plaintiffs,)
)
vs.)
)
THE BOEING COMPANY, et al.,)
)
Defendants.)
)
)

STIPULATION AND [PROPOSED] ORDER APPOINTING LEAD PLAINTIFF AND LEAD COUNSEL

1. WHEREAS, the above-captioned action (the “Action”) was filed in the United States District Court for the Eastern District of Virginia, Alexandria Division, on January 30, 2024 on behalf of a putative class of investors who purchased shares of The Boeing Company’s stock between October 23, 2019 and January 24, 2024 (the “Class”);

2. WHEREAS, two motions for appointment of lead plaintiff and approval of selection of lead counsel were filed on the April 1, 2024 statutory deadline pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”);

3. WHEREAS, the State of Rhode Island Office of the General Treasurer, on behalf of the Employees' Retirement System of the State of Rhode Island ("Rhode Island") filed a motion for appointment as lead plaintiff and approval of Labaton Keller Sucharow LLP ("Labaton") as lead counsel (ECF 13);

4. WHEREAS, Local #817 IBT Pension Fund (the “IBT Pension Fund”), filed a motion for appointment as lead plaintiff and approval of Robbins Geller Rudman & Dowd LLP (“Robbins Geller”) as lead counsel (ECF 18);

5. WHEREAS, Rhode Island and the IBT Pension Fund, as the only two movants for lead plaintiff appointment on the statutory deadline, have determined that it is in the best interests of the Class to jointly prosecute this Action;

6. WHEREAS, Rhode Island and the IBT Pension Fund are both institutional investors with significant experience serving as lead plaintiff in other actions brought pursuant to the PSLRA; and

7. WHEREAS, Rhode Island and the IBT Pension Fund are committed to supervising the conduct of this litigation by their counsel and ensuring that counsel coordinate appropriately and avoid any duplication of effort in the prosecution of the litigation;

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, as follows:

1. Every pleading in the Action shall have the following caption: *In re The Boeing Company Securities Litigation*, Case No. 1:24-cv-00151-LMB-LRV (E.D. Va.). The file in Case No. 1:24-cv-00151-LMB-LRV shall be the master file for the Action. All securities class actions on behalf of purchasers of Boeing securities arising out of the same or substantially similar subject matter subsequently filed in, or transferred to, this District shall be consolidated into this Action. This Order shall apply to every such action, absent an order of the Court. A party objecting to such consolidation, or to any other provisions of this Order, must file an application for relief from this Order within ten days after the later-filed action is consolidated into this Action.

2. Pursuant to 15 U.S.C. §78u-4(a)(3)(B), Rhode Island and the IBT Pension Fund are appointed as Lead Plaintiff to represent the interests of the Class in this Action; and

3. Pursuant to 15 U.S.C. §78u-4(a)(3)(B)(v), Labaton and Robbins Geller are approved as Lead Counsel for the Class, and Cohen Milstein Sellers & Toll PLLC and the Office of Craig C. Reilly as Liaison Counsel for the Class.

4. Lead Plaintiff shall file an Amended Complaint within forty-five (45) days of the date of this Order.

IT IS SO STIPULATED.

Dated: April 15, 2024

Respectfully submitted,

/s/ Steven J. Toll

**COHEN MILSTEIN SELLERS
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State of Rhode Island and Proposed Liaison
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/s/ Craig C. Reilly

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[PROPOSED] ORDER GRANTING STIPULATION

Pursuant to stipulation and for good cause shown, IT IS SO ORDERED.

DATED: April __, 2024

THE HONORABLE LEONIE M. BRINKEMA
UNITED STATES DISTRICT JUDGE